

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :
 :
 :
 : Criminal No. _____
 :
 : Date Filed: _____
 v. :
 : VIOLATION: 18 U.S.C. Section
 : 1344 (Bank fraud -
 : 2 counts)
 MICHELLE CILELI :
 : 18 U.S.C. Section
 : 2 (Aiding and
 : abetting)

 Notice of
 Forfeiture

I N D I C T M E N T

THE GRAND JURY CHARGES THAT:

At all times material to this Indictment:

1. Defendant MICHELLE CILELI was a resident of the City of Philadelphia who resided at 2059 Granite Street in Philadelphia, PA.

2. First Union Bank (now Wachovia Bank) was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC).

3. Southeast Family Federal Credit Union (SECU) was a financial institution whose deposits were insured by the National Credit Union Association Insurance Fund (NCUA).

4. From in or about September 26, 2003 and continuing until on or about October 15, 2003 in the Eastern District of Pennsylvania and elsewhere, defendant

MICHELLE CILELI

knowingly executed and attempted to execute a scheme to defraud First Union Bank and SECU and to obtain monies owned by and under the care, custody, and control of First Union Bank and SECU by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

_____It was part of the scheme that:

5. On or about September 29, 2003, defendant MICHELLE CILELI deposited a \$ 14,900 counterfeit First Union Bank check, drawn on the account "G.S.", into her into bank account at SECU knowing that the First Union check was counterfeit.

6. Defendant MICHELLE CILELI received the check from another person who is unknown to the grand jury. She agreed to deposit the counterfeit check and withdraw funds against that check. Defendant MICHELLE CILELI would keep some of the money and give the bulk to the person who provided her with the check.

7. On or about October 14, 2003, defendant MICHELLE CILELI withdrew \$ 3,000 in cash from her account at SECU after the counterfeit check had been honored by Wachovia Bank.

In violation of Title 18, United States Code, Sections 1344 and 2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count One are incorporated here.

2. Keystone Savings Bank was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation.

3. On or about October 10, 2003 in the Eastern District of Pennsylvania and elsewhere, defendant

MICHELLE CILELI

knowingly executed and attempted to execute a scheme to defraud Keystone Savings Bank and SECU and to obtain monies owned by and under the care, custody and control of Keystone Savings Bank and SECU by means of false and fraudulent pretenses, representations and promises.

THE SCHEME

_____ It was part of the scheme that:

4. Defendant MICHELLE CILELI deposited a stolen \$ 4,300 check into her account at SECU.

5. Defendant MICHELLE CILELI received the check, which had been from stolen from an account holder at

Keystone Savings Bank, from another person unknown to the grand jury.

6. Defendant MICHELLE CILELI attempted to withdraw funds from her account after depositing the \$ 4,300 check but was unable to do so. Keystone Savings Bank refused to honor the \$ 4,300 check because the account holders at Keystone Savings, from whom the check had been stolen, had closed the account

In violation of Title 18, United States Code, Sections 1344 and 2.

NOTICE OF FORFEITURE

1. As a result of the violations of Title 18, United States Code, Section 1344, set forth in Counts One and Two of this Indictment, the defendant

MICHELLE CELILI

shall forfeit to the United States of America any property constituting, or derived from, proceeds obtained directly or indirectly as the result of the violations of Title 18, United States Code, Section 1344, as charged in this Indictment, including, but not limited to, the sum of \$14,900 which was deposited into SE Family Federal Credit Union Account # 45259.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which
cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18,
United States Code, Section 982(b), incorporating 21 U.S.C.
§ 853(p), to seek forfeiture of any other property of the
defendant up to the value of the property subject to
forfeiture.

All pursuant to Title 18, United States Code, Section
982(a)(2).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney